

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

MIGUEL RIVERA §
Plaintiff §
§
V. § NO. 5:12-cv-00506
§
LOVE, BEAL & NIXON, P.C. §
MIDLAND CREDIT MANAGEMENT, §
INC., ENCORE CAPITAL GROUP §
AND MIDLAND FUNDING, LLC §
Defendants

JOINT MOTION TO EXTEND DEADLINES

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, under F.R.C.P. 6(b), Plaintiff Miguel Rivera and Defendants Love, Beal & Nixon, P.C., Midland Credit Management, Inc., Encore Capital Group and Midland Funding, LLC (“Defendants”) and files their Motion to Extend Deadlines, as follows:

1. Plaintiff and Defendants are in agreement for additional time to conduct discovery and are requesting the Court to continue the deadlines as outlined as follows:

Completion of Discovery May 15, 2013

Deadline for Rule 26(a)(3) disclosures June 1, 2013

Deadline for objections under Rule (26)(a)(3) June 15, 2013

Deadline for the ADR Report is

May 15, 2013

Deadline for all Motion (including dispositive motions)

June 1, 2013

2. The Parties had scheduling conflicts that prevented the completion of discovery by the current deadline.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants pray the Court enters an order extending deadlines and such other and further relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

MICHAEL J. ADAMS P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2013, a true and correct copy of the foregoing was served on all parties through the ECF system and their attorneys of record.

/s/ Joseph Panvini
Joseph Panvini